

GJP

IN THE UNITED STATES DISTRICT COURT
OF
EASTERN DISTRICT OF PENNSYLVANIA

Craig Boston, prose
vs.

18 0974

BUCKS COUNTY CORRECTIONAL
FACILITY; Dr. Cassidy; Ms.
Budd

Complaint

1. Boston is a citizen of the United States and an inmate at B.C.C.F.
2. Bucks County Correctional Facility is an agency of the Government and is being sought in its individual capacity.
3. Dr. Cassidy is a psychologist in charge of Mental Health treatment at B.C.C.F. [Individual Capacity]
4. Ms. Budd is a deputy warden at B.C.C.F. and is in charge of inmate services [Individual Capacity]
5. Boston is filing this complaint under Section 1983 [Prison Complaint] for infraction against the Equal Protections Clause of the Fourteenth Amendment, and Inadequate

Medical Care of the Eight Amendment, Deprivations of rights secured by the United States Constitution. He represents the following:

6 After an incident on 12/1/16, where Boston threatened an inmate (Inmate Heppard was investigated two days later and found to have been extorting Boston), he was placed in the R.H.U. (restricted housing unit), then placed by administration back onto Generally Populated Mental Health Block, Gulf Module. By Boston punitive expiration date, 1/15/17, he'd resumed taking his medication and eating his food for over thirty days, and hadn't exhibited any mental disfunctions. On that date Dr. Cassidy placed him on Mental Health lock, and restricted him to his cell. When asked why another inmate who'd been repeated aggressive, and injected on countless occasions was allowed out of his cell, Dr. Cassidy stated that the inmate hadn't been arrested for the same thing Boston had. Dr. Cassidy habitually used this fact to lock Boston on mental health lock (Grievance was filed due to her actions). Dr. Cassidy later moved Boston to the M.H.U. (Mental Health Unit). Boston does suffer from mental illness, but not so much as to have moved him off of a General Population Mental Health Module and place him on a solitary unit, which housed the eight inmates considered to be most severely afflicted. Dr. Cassidy acted without rational relation to the purpose beyond Boston's charges.

7 Where regular inmates received writeups and punitive punishments, Boston received both punitive discipline, and additional lock on Mental health status after he'd served out his punitive time. In which he would still remain locked in isolation. This without

any displays of psychological incompetence, or aggressions. Dr. Cassidy's procedure later manifested into Dr. Cassidy locking Boston for memos and daily logs that suggested even the slightest discourse. Acts that other inmates would not have been penalized for beyond an already given redirection. Boston was routinely moved back and forth from the M.H.U. to the R.H.U., at times where he didn't get written up and there were no infractions to the prisons rules, and where other inmates in the M.H.U. would simply remain there if written up, with an adjusted R.H.U. status. If Boston had a write up he'd remain in the R.H.U. far beyond his punitive expiration. In the period of a year surrounding his claim Boston hadn't been in one physical altercation, nor had he been sedated for any acts of aggression. He'd also never been placed on mental health watch for psychological acts, only placed on lock. Where other inmates were consistently disruptive and violent, with a week or so of normal non-disruptive behavior they were allowed to move to a functional unlocked mental health module. Boston was never afforded that opportunity. Dr. Cassidy's acts bore no rational relationship to legitimate penological interest, and were without rationality in the classification of treatment. Boston was treated unequally to individuals similarly situated under Dr. Cassidy's care.

8. [REDACTED] Boston's deprivements as an inmate in the M.H.U. and sporadically the R.H.U. included, the exclusion or religious services, vocational / education programs, access to freely research the law beyond knowing a specifically detailed inquiry of info needed, & drug treatment. Boston also alleges the denial of due rights of internal procedure and basic dignity. Through this period Boston was denied a multitude of

beneficial programs and policies all on the basis of nothing more than Dr. Cassidy's indifference to Boston criminal charges of Attempted Murder of a woman.

9. Boston extensively suffered the emotional abuse of solitary confinement without realistic justification, and unequally subjected to emotional and psychological isolation, extreme depression, and marginal abuse. In addition to solitary confinement in the M.H.U., placing Boston in the restricted housing unit without reasonable purpose, with troubled inmates, for indefinite periods of time created a self-perpetuating situation causing emotional and psychological deterioration. This without proper mental healthcare and guidance.

10. B.C.C.F. by way of Dr. Cassidy, and inmate services [Ms. Budd] administration failed to provide adequate medical treatment by habitually being unresponsive to request to be seen for chronic mental despair and intervention into Boston's claims of abuse and stigmatization. Dr. Cassidy systemically skipped Boston during daily rounds at times in the excess of multiple months, and throughout Boston's stay in the M.H.U. and R.H.U. Dr. Cassidy missed rounds at least 2-3 times during a week. The accused further failed to care constitutionally, by failing in their statutory obligation to establish appropriate treatment programs for mentally ill ~~inmates housed in the M.H.U.~~ inmates housed in the M.H.U. Classified as the most ill inmates, inmates in the M.H.U., even those allowed out of their cells, are not listed or even entitled to cognitive treatment, therapy, or any other

psychological treatment in contradiction to their status. Programs which the general population have access to. This practice bears no penalogical interest.

On November 28, 2018, Boston met with B.C.C.F. administration he had supplied them with a copy of this complaint. Boston was allowed onto General Population [G-Module] that day and relieved of his isolation, as he had been in segregation [R.H.U.] without misconduct for an extended period. On 12/21/18 Boston was removed from G-Module with out any incidents of misconduct or rule violations. His clothes were taken and he was locked. Boston was never told why and after weeks of inquiry without response Boston's mental stability was finally compromised. He remains in the R.H.U.

Wherefore the Plaintiff respectfully requests that sanctions are made in his favor to ensure that adequate care is provided to the mentally impaired, and unequal treatment is nullified. He requests a monetary amount of \$300,000 for emotional neglect and unequal treatment resulting in extreme emotional and psychological deterioration. \$100,000 for the deprivation of programs beneficial to his mental stability and in adequate medical care resulting in distress.

Respectfull Requested
2/2/18

Craig Boston, prose
Craig Boston
1730 S. Easton Rd.
Doylestown, PA, 18901

120746

ALL INMATES FILL IN THIS SECTION

Name (Last, First)

Boston, Craig

Date

2/11/18

Module and Cell Number

RHU # 9

Admission Date

8/12/16

I would like to see

~~Warden~~

BWS off

I need to see that staff person because

Can you please provide me with 6 months of my past inmate account interactions to date.

Thank You

Craig Boston

(Signature of Inmate)

Do Not Write Below This Line

Date request answered:

Answer: We do not provide offenders with account transaction reports.

Referral Sent To:

Return To:

Module & Cell #

Signature of Staff Person

Business Office